IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

FTX TRADING LTD., et al., 1 Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

ALAMEDA RESEARCH LLC, FTX TRADING LTD., WEST REALM SHIRES, INC., AND WEST REALM SHIRES SERVICES INC. (D/B/A FTX.US),

Plaintiffs,

v.

DANIEL FRIEDBERG,

Defendant.

Adv. Pro. No. 23-50419 (JTD)

STIPULATION FOR AN EXTENSION OF TIME FOR DEFENDANT TO RESPOND TO COMPLAINT

Plaintiffs, Alameda Research LLC, FTX Trading Ltd., West Realm Shires, Inc., and West Realm Shires Services Inc. (d/b/a FTX.US) (the "Plaintiffs"), and Defendant Daniel Friedberg (the "Defendant" and, together with the Plaintiffs, the "Parties"), by and through their respective undersigned counsel, enter into this *Stipulation for an Extension of Time for Defendant to Respond to Complaint* (the "Stipulation") and hereby stipulate and agree as follows:

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

- 1. On June 27, 2023, the Plaintiffs initiated the above-captioned adversary proceeding by filing the *Complaint* [Adv. D.I. 1] (the "Complaint").
- 2. On July 7, 2023, the Defendant executed a *Waiver of the Service of Summons* [Adv. D.I. 6], agreeing to accept and waive his objections, if any, to service of process. The Defendant's deadline to respond to the Complaint is September 15, 2023.
- 3. The Parties have conferred regarding an agreement to extend the Defendant's response deadline.
- 4. The Defendant's deadline to respond to the Complaint shall be extended through and including October 4, 2023.
- 5. This Stipulation is without prejudice to the rights of the Parties to seek a further extension and/or continuance as appropriate.

Dated: September 27, 2023

LANDIS RATH & COBB LLP

/s/ Matthew B. McGuire

Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, DE 19801
Telephone: (302) 467-4400
landis@lrclaw.com
mcguire@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

Counsel to the Debtors and Debtors-in-Possession

-and-

QUINN EMANUEL URQUHART & SULLIVAN, LLP

William A. Burck (admitted *pro hac vice*) 1300 I Street NW, Suite 900 Washington, D.C. 20005 (202) 538-8000 williamburck@quinnemanuel.com

Sascha N. Rand (admitted *pro hac vice*)
Katherine A. Lemire (admitted *pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, New York 10010
(212) 849-7000
sascharand@quinnemanuel.com
katherinelemire@quinnemanuel.com

Special Counsel to the Debtors

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Rafael X. Zahralddin

Rafael X. Zahralddin (No. 4244) 500 Delaware Avenue, Suite 700 Wilmington, DE 19801 Telephone: (302) 985-6004 Rafael.Zahralddin@lewisbrisbois.com

Counsel to Defendant Daniel Friedberg